

## **6 – 1 FULL-TIME ONSITE INSPECTORS AT WASTE FACILITIES**

**ISSUE:           Should low-level radioactive waste disposal facilities have state inspectors onsite full-time?**

**RESPONSE:**

The schedule and procedures for regulatory oversight are determined by the Division, consistent with its laws and rules. The owner/operator is responsible for compliance with state and federal laws. The inspector's oversight is one means of determining if there are violations of regulatory and license requirements. DEQ has recommended additional regulatory staff be hired if additional facilities are licensed. However, DEQ does not recommend continuous, full-time onsite inspectors for current operations. If an increased inspection presence onsite is proposed, the costs and benefits of the additional oversight should be evaluated.

**BACKGROUND:**

The following is a comparison of the Utah Division of Radiation Control regulatory oversight program and the regulatory programs at Richland, Washington and Barnwell, South Carolina. Unlike Envirocare, the Richland and Barnwell sites currently accept Class B and C wastes in addition to Class A wastes.

- All disposal sites require information from the generators prior to shipment of waste to ensure that such waste will meet the conditions of the license.
- All waste shipments are accompanied by a Uniform Radioactive Waste Manifest that provides a detailed description of the waste stream for both emergency responders and the disposal facilities (Utah requires a waste manifest for all shipments, even though the U.S. Department of Transportation does not require it for certain types of radioactive waste.)
- All three states require a permit from the generator or their designated shipper prior to transport of the waste. This holds the generator/shipper of the waste responsible to ensure the waste arrives in a safe manner and is properly packaged, labeled, classified, marked, and manifested according to all applicable federal transportation regulations. A generator/shipper who does not comply with transportation regulations is subject to enforcement action by the state including suspension or revocation of the permit that allows that generator to access the disposal site.
- Upon receipt at the facility, the waste shipment is checked to assure information on the manifest is representative of the waste. The Division of Radiation Control performs random checks on shipments of waste. Shipments are inspected to ensure conformance with state and federal standards for radioactive waste packaging, transportation, labeling, notification, classification, marking, manifesting or description.
- Compared to Barnwell and Richland, the number of shipments received at Envirocare is significantly higher. Barnwell and Richland do not have rail access so they receive only truck shipments. The Richland and Barnwell sites typically receive fewer truck shipments per week. On average, Envirocare receives 213 rail cars per week and 36 trucks per week.

- “Full-time” inspector is a misleading term, since typically the other states have the inspector on-site during normal business hours, not on a 24/7 basis.
- The “full-time” inspector at Barnwell typically conducts transportation inspections of incoming shipments. He lives in a community close by the facility. Other South Carolina DHEC staff are available to conduct the routine and special inspections necessary at the site.
- The “full-time” inspector at Richland also conducts transportation inspection of incoming shipments. Due to the limited volume of waste now being received at the Richland facility, the state of Washington does not have a “full-time” inspector on the site every day. Other Washington Department of Health staff are available to conduct the routine and special inspections necessary at the site.
- Significant increases in manpower would be necessary to man the facilities on a 24/7 basis as well as providing full-time coverage during normal business hours including any seasonal shift work.
- The Nuclear Regulatory Commission considers an "annual" inspection adequate for a low-level waste disposal facility.